

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

CIVIL ACTION: 04-CV-11069-JLT

ABRAHAM PHILIP, MD

Plaintiff,

vs.

JOHN CRONIN, in his personal  
capacity.

Defendant.

AFFIDAVIT OF ABRAHAM PHILIP, MD

I, Abraham Philip, MD, state the following facts on the basis of personal knowledge. If called as a witness, I would testify as follows.

1. On or about September 2, 2003, I entered into a contract for employment with the Office of the Chief Medical Examiner ("OCME"). This was the fourth time I had been hired by the OCME.
2. During and before the period of October 2, 2003 to March 3, 2004, I made to Mr. John Cronin numerous suggestions for what I believed would be improvements in the operations of the OCME.
3. On or about January 30, 2004, I was approached to approve the harvesting of organs from a young man who was not yet brain-dead. I declined to do so for medical and ethical reasons.
4. After I declined to authorize the removal of body parts from a person who was not



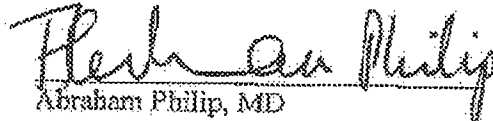
yet dead, my understanding is that the persons who wanted to harvest the body parts obtained the authorization of the Chief Medical Examiner, Dr. Richard Evans, to do so.

5. On March 3, 2004, John Crogin told me that I would no longer be permitted to conduct "cremation certification duty", a duty to which all other medical examiners were still assigned.

6. This concludes my affidavit.

SIGNED UNDER PAINS AND PENALTIES OF PERJURY

6/4/2005

  
Abraham Philip, MD